



Independent Wealth Network

2350 128th Street
Urbandale, Iowa 50323
515-461-5123

www.indwealth.net

Business Continuity Plan

Effective November 1, 2022

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Business Continuity Policy

Independent Wealth Network, Inc.'s ("IWN") Business Continuity Policy ("BCP") is to respond to a Significant Business Disruption ("SBD") by first ensuring the safety of its personnel and the firm's property. The firm will conduct a financial and operational assessment to assess the damage caused by the SBD, then begin the recovery process and resume operations to allow our clients to resume transactions. The protection of all of IWN's books and records are of the utmost importance. If the firm determines it is unable to continue business as usual, we will assure clients prompt access to their funds and securities.

Emergency Contact Persons

The firm will provide contact information for two emergency contact persons, including name, title, mailing address, email address, telephone number, and facsimile number. This information will be updated no later than 30 days following a change and annually.

The firm's two emergency contacts:

Primary Contact Person

Art Dinkin, Chief Compliance Officer

Work Phone: (515) 255-3354

Mobile Phone: (515) 201-7591

Email: adinkin@indwealth.net

Secondary Contact Person

Andrew Endelman, Director of Operations

Work Phone: (515) 461-5123

Mobile Phone: (319) 215-8869

Email: aendelman@indwealth.net

Significant Business Disruptions

IWN's BCP anticipates both internal and external SBD's. Internal SBDs are those which affect only the firm's ability to communicate and do business. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. The response to an external SBD will rely more heavily on other organizations and systems, including our clearing firm's capabilities.

Approval and Execution Authority

IWN's Chief Compliance Officer (CCO) is responsible for approving the plan, conducting the required annual review, and has the authority to execute this BCP.

Plan Location and Access

IWN will maintain copies of its BCP plan and the annual reviews, and any changes that have been made to it for inspection. An electronic version of the plan will be available.

Business Description

IWN provides asset management, financial planning and consulting, and/or retirement plan consulting services to certain individual clients, pension and profit-sharing plans, trusts, estates or charitable organizations, and corporations. The firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, the firm does not hold client funds or securities. It accepts, enters, and executes orders. All transactions are sent to a clearing firm, which compares, allocates, clears, and settles them. The clearing firm also maintains client accounts, can grant clients access to their accounts and delivers funds and securities. The firm services both retail and institutional clients.

IWN's clearing firm TD Ameritrade is our primary location and can be reached via phone at 800-669-3900.

Office Location(s)

IWN engages in order-taking and entry at this location.

Office Location
2350 128th St
Urbandale, IA, 50323

Alternative Physical Location(s) of Employees

In the event of an SBD, IWN's personnel will operate electronically away from the affected office(s). Staff can process transactions electronically, including the execution of client orders and instructions regarding the transmission of funds to and from the clearing firm.

Clients' Access to Funds and Securities

IWN does not maintain custody of clients' funds or securities, which are kept by its clearing firm, TD Ameritrade. In the event of either an internal or external SBD, if telephone service is available, IWN's registered investment adviser representatives and associated persons will take client orders or instructions and contact our clearing firm on their behalf. If Web access is available, the firm will post on its website that clients may access their funds and securities by contacting it at (515) 461-5123, by going to our website <http://www.indwealth.net>, or by emailing us compliance@indwealth.net. The firm will make this information available to clients through its disclosure policy.

Data Back-Up and Recovery

IWN maintains its electronic records at 2350 128th St, Urbandale, IA 50323 and is responsible for the maintenance of books and records. The firm maintains the following document types and forms which may be transmitted to the clearing firm but are not required to be forwarded to our clearing firm:

- New Account Forms
- Client Agreements
- Limited Powers of Attorney Forms
- Investment Policy Statements

The firm maintains electronic books and records through cloud-based systems with Citrix Sharefile, Redtail, Red Oak, Messagewatcher, Pontera, and Orion. Each of these vendors duplicates IWN's records at remote backup sites. Our due diligence confirms these backup facilities operate in a geographically separate area with the capability to conduct the same volume of business as the primary facilities. The vendors confirm the effectiveness of its backup arrangements to recover from a wide-scale disruption by testing, and they regularly test their backup arrangements.

Currently, a large majority of the firm's systems to function as a business are hosted environments that provide for business continuity. With that in mind, the hosting providers' continuity plans become a large part of the BCP.

Internally there are safeguards and procedures in place to provide local continuity. These include a large UPS power supply, which gives protection for network equipment.

Individual computer systems update automatically with hardware patches, software patches, security patches, and other necessary updates. The antivirus product is configured to update constantly, and the version control on the firewall is closely monitored and upgraded as needed. In the event of an internal or external SBD, IWN will access documents from the cloud based systems.

Operational Risk

Operational risk includes threats or constraints to IWN's ability to maintain communications with clients and retrieve key activity records through its mission-critical systems.

In the event of an SBD, the firm will immediately identify what means will allow it to communicate with our clients, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options the firm will employ include the website, telephone voice mail, secure email, etc. The firm will also retrieve our key activity records as described in the section above, Data Back-Up and Recovery.

Financial and Credit Risk

In the event of an SBD, IWN will determine the value and liquidity of its investments and other assets to evaluate its ability to continue to fund operations and remain in capital compliance. IWN will contact its clearing firm, critical banks, and investors to apprise them of its financial status. If it is determined that the firm may be unable to meet our obligations to those counter-parties or otherwise continue to fund its operations, the firm will request additional financing from its bank or other credit sources to fulfill its obligations to clients if the firm cannot remedy a capital deficiency, IWN will file appropriate notices with its regulators and immediately take appropriate steps, including the protection of client assets, and the closing of its operations.

Mission Critical Systems

IWN's "mission-critical systems" are those which ensure prompt and accurate processing of securities transactions, including order taking, entry of securities transactions, the maintenance of client accounts, access to client accounts, and the delivery of funds and securities.

The firm has primary responsibility for establishing and maintaining its business relationships with clients and has sole responsibility for its mission-critical functions of order-taking and entry. Through the contract, its clearing firm provides the execution, comparison, allocation, clearance, and settlement of securities transactions, the maintenance of client accounts, access to client accounts, and the delivery of funds and securities.

Our clearing firm contract provides that the clearing firm will maintain a business continuity plan and the capacity to execute that plan. The clearing firm represents that it will advise IWN of any material changes to its plan that might affect IWN's ability to maintain its business and has presented an executive summary of its plan (Appendix D). The clearing firm represents, in the event, it executes its plan, that it will notify IWN of such execution and provide the firm equal access to services as its other clients. If IWN reasonably determines that the clearing firm has not or cannot put its plan in place quickly enough to meet the firm's needs or is otherwise unable to provide access to such services, the clearing firm represents that it will assist IWN in seeking services from an alternative source.

IWN's clearing firm represents that it backs up IWN's records at a remote site. The clearing firm represents that it operates a backup operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. The clearing firm has also confirmed the effectiveness of its backup arrangements to recover from a wide-scale disruption by testing, and it has confirmed that it tests its backup arrangements four times a year.

Recovery-time objectives provide concrete goals to plan for and test against. However, they are not hard and fast deadlines that must be met in every SBD, and various external factors surrounding a disruption, such as time of day, the scope of disruption, and status of critical infrastructure – particularly telecommunications – can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption relates to the capacity to accept and process new transactions and payments after a wide-scale disruption. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period of less than four hours; and resumption time of less than four hours.

The CCO will periodically review our clearing firm's capabilities to perform the mission-critical functions the clearing firm has contracted to perform for the firm.

Order Taking

IWN receives orders from clients via telephone or in-person visits by the client. During an SBD, either internal or external, the firm will continue to take orders through any of these methods that are available and reliable. As communications permit, the firm will inform our clients when communications become available to tell them what alternatives they have to send their orders to the firm. Clients will be notified of alternatives by voice messages and by

postings on our website. We may advise our clients to place orders directly with us by calling (515) 461-5123.

Order Entry

In the event of an internal SBD, IWN will enter and send records to our clearing firm by the fastest alternative means available, including email, US Mail, overnight courier, and facsimile. In the event of an external SBD, we will maintain the order in electronic or paper format and deliver the order to the clearing firm by the fastest means available when that firm resumes operations. Also, during an internal SBD, IWN may need to refer our clients to deal directly with the clearing firm for order entry.

Order Execution

IWN currently executes orders by review and release. In the event of an internal or external SBD, the firm would release all orders to its custodian for execution.

Alternate Communications between the Firm and Clients, Personnel, and Regulators

Clients

IWN communicates with clients using the telephone, email, our website, US mail, and in-person visits at our firm or other locations. In the event of an SBD, we will assess which means of communication are still available to use and choose the means closest in speed and form (written or oral) to the means that it has used in the past to communicate.

Personnel

IWN may communicate with its employees and affiliates using the telephone, email, text, instant messaging systems, or in person. In the event of an SBD, the firm will assess which means of communication are still available to use and choose the means closest in speed and form (written or oral) to the means that it has employed in the past to communicate with the other party. The firm will employ a call tree so that senior management can reach all employees quickly during an SBD.

The person to invoke the use of the call tree is the **CCO or delegate**.

Caller	Call Recipients
Art Dinkin	Andrew Endelman, Jeff Zupancic, Erik Blase, Gary Bilyeu, Brant Collier, Patrick Owens, Dave Rigg
Andrew Endelman	LeKisha Franklin, Russ Kramer, Jared Kramer, Don Rosalez
Jeff Zupancic	Julie Boulden, Ross Bonifield, Nancy Bullock-Swanson, Enrique Hernandez, Jim Poindexter, Nancy Schnider
Erik Blase	Jim Bey, Kristina Dahl, Erik Holt, Ryan Timmins,
LeKisha Franklin	Scott Etzel, Garret Morgan, Kathleen Williams-Price, Mike Rodgers

Critical Business Constituents, Banks, and Counter-Parties

Business Constituents

IWN has contacted its critical business constituents (businesses with which the firm has an ongoing commercial relationship in support of its operating activities, such as vendors providing us essential services) and determined the extent to which the firm can continue our business relationship with them in the event of an internal or external SBD. IWN will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when it needs them because of an SBD to them or our firm.

The alternative suppliers are disclosed in Appendix B.

Banks

IWN has contacted our banks and lenders to determine if they can continue to provide the financing that it will need in light of an internal or external SBD. The banks maintaining the firm's operating accounts are Wells Fargo and Security National Bank of Omaha,

If IWN's banks and other lenders are unable to provide the financing, it will seek alternative financing immediately from alternative sources.

Counterparties

IWN has contacted its critical counterparties, such as other broker-dealers or institutional clients, to determine if it will be able to carry out our transactions with them in the event of an internal or external SBD. Where the transactions cannot be completed, the firm will work with its clearing firm or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

Disclosure of Business Continuity Plan

IWN will disclose a summary of our BCP to clients at account opening and annually. It will also post the summary on its website and mail it to clients upon request.

The summary addresses the possibility of a future SBD and how the firm plans to respond to events of varying scope. In dealing with the events of varying scope, this summary (1) provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption); (2) states whether we plan to continue business during that scenario and, if so, our planned recovery time; and (3) provides general information on our intended response. The summary discloses the existence of backup facilities and arrangements. (See Appendix F for Website disclosure)

Contacting Us – If, after a significant business disruption, a client cannot contact us as they usually do, they should call the alternative numbers provided in this document or go to our website. If they cannot access us through either of those means, they should contact our

clearing firm at the contact numbers provided in this document. IWN's BCP is designed to permit that firm to resume operations as quickly as possible, depending on the scope and severity of the significant business disruption. Since the timing and impact of disasters and disruptions is unpredictable, the firm will have to be flexible in responding to actual events as they occur. In any scenario, the firm plans to continue in business, transfer operations to our clearing firm if necessary, and notify clients through our website www.indwealth.net or our customer emergency number, to contact us. If the SBD is so severe that it prevents us from remaining in business, we will assure our customers' prompt access to their funds and securities.

IWN's clearing firm advises that its objective is to restore its own operations, complete existing transactions, and accept new transactions and payments as quickly as possible. Client orders and requests for funds and securities could be delayed during this period.

Updates and Annual Review

IWN's Chief Compliance Officer or his delegate will update and approve this plan whenever it has a material change to its operations, structure, business or location or to those of its clearing firm. The firm's Chief Compliance Officer or his delegate will also review and approve this BCP annually in the last 2 months of each year to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

By: _____
Name: Art Dinkin
Title: Chief Compliance Officer

Appendix A - Employee Telephone Lists

Employee	Mobile #	Email	Time Called	Comment
Jim Bey	630-204-6479	jbey@pfgllcemail.com		
Gary Bilyeu	940-367-6687	gbilyeu@kfafin.com		
Erik Blase	636-856-3477	eblase@indwealth.net		
Ross Bonifield	602-451-6359	ross@pfgllcemail.com		
Julie Boulden	515-868-2944	jboulden@indwealth.net		
Nancy Bullock-Swanson	480-703-0954	nancy@pfgllcemail.com		
Brant Collier	817-578-5078	brantcollier@kfafin.com		
Kristina Dahl	623-640-2613	kkdahl@sunburstaz.com		
Art Dinkin	515-201-7591	adinkin@indwealth.net		
Andrew Endelman	319-215-8869	aendelman@indwealth.net		
Scott Etzel	515-490-6831	setzel@etzelfinancialresources.com		
LeKisha Franklin	515-201-3979	lfranklin@indwealth.net		
Stephen Gilchrist	310-213-2021	sg@gilchristwealth.com		
Enrique Hernandez	915-588-8716	henry@pfgllcemail.com		
Erik Holt	240-878-0089	erik@holtadvisory.com		
Jared Kramer	515-729-3660	jbkramer@iwnadvisor.com		
Russ Kramer	515-778-1665	rkramer@iwnadvisor.com		
Scott McCord	309-868-0131	scott@anthem-financial.com		
Garrett Morgan	806-928-1936	garrett@archerfp.com		
Tim Oberley	260-418-0124	tim@cifsw.com		
Patrick Owens	816-289-7021	powens@dvfin.com		
Jim Poindexter	928-713-2600	jpoindexter@mcdermottadvisors.com		
Dave Rigg	903-647-2194	drigg@kfafin.com		
Mike Rodgers	630-728-4298	mike@pfgllcemail.com		
Don Rosalez	602-882-5396	drosalez@pfgllcemail.com		
Nancy Schneider	602-448-5885	nschneider@pfgllcemail.com		
Kathleen Williams-Price	806-790-3651	kathleen@archerfp.com		
Jeff Zupancic	602-686-4132	jeff@indwealth.net		

Appendix B – Vendor List

The firm's suppliers are disclosed below.

Vendor Name	Goods/Service Provided	Contact Name	Email Address / Website	Phone #
Redtail	CRM		https://corporate.redtailtechnology.com/support	800-206-5030
Citrix	Cloud Storage		https://www.citrix.com/contact/customer-service.html	800-424-8749
Orion	Portfolio Solutions		https://www.orionportfoliosolutions.com/contact-us/	800-379-2513
Microsoft	Office 365		https://support.microsoft.com/en-us/topic/global-customer-service-phone-numbers-c0389ade-5640-e588-8b0e-28de8afeb3f2	800-642-7676
Red Oak	Advertising Review		https://www.redoakcompliance.com/	888-302-4594
MessageWatcher	Email & Social Media archiving		https://messagewatcher.com/contact/	888-317-3278

TD Ameritrade	Custodian		https://www.tdameritrade.com/why-td-ameritrade/contact-us.html	800-669-3900
SEI	TPMM		https://www.seic.com/contact-us	800-342-5734
Pro Network Solutions	Internet provider		https://pronetworksolutions.com/	515-331-0024
DWebware	Website hosting		https://www.dwebware.com/	515-270-1701
Intermedia	Telephone System		https://www.intermedia.com/	800-379-7729
Pontera	Order Management		https://www.pontera.com/	888-677-3339

Appendix C – Succession Plan

There is an agreement in place with the partners of IWN for the continuation of business operations.

Appendix D - Clearing Firm Business Continuity Plan Executive Summary



TD Ameritrade Business Continuity Plan Statement

PO Box 2209 ■ Omaha, NE 68103-2209

Securities industry regulations require that brokerage firms inform their clients of their plans to address the possibility of a business disruption that potentially results from key types of scenarios: loss of technology, loss of workplace, loss of personnel or other events. TD Ameritrade has a comprehensive business continuity program in place, which is reviewed, updated and tested on a regular basis. The program is intended to maintain business operations such as processing client orders and transactions, providing access to cash and securities, and providing access to information about balances and transactions in client accounts.

Examples of how TD Ameritrade's plan addresses disruptions of varying scope and magnitude include:

- Disruption of service at any of our service centers may result in calls, orders, and electronic communications being rerouted to an alternative service center located in a different region of the country with a separate power grid and transportation system.
- In the event of a public health crisis that resulted in a high rate of employee absenteeism, TD Ameritrade's plan focuses available personnel on critical business functions that directly support client needs and financial markets. Additionally, we may enact our conditional work from home and/or workforce continuity plan, which includes social distancing and other policies to limit exposure.
- A significant disruption in our primary data center may result in the recovery of systems at an alternate data center. Our data centers are each supported by backup power generators and are located in different regions of the country with different power grids and transportation networks.

While no contingency plan can eliminate all risk of service interruption or temporarily impeded account access, we continually assess and update our plans to mitigate all reasonable risk. Any modifications to our plan will be reflected in this Business Continuity Plan Statement, which will be posted on our website, or you may obtain a current version of this Statement by writing us at TD Ameritrade, Inc., Compliance Department, P.O. Box 2148, Omaha, NE 68103-2148.

Appendix E – Regulators

IWN is an SEC-registered investment advisory firm. The firm communicates with our regulator using the telephone, email, facsimile, US mail, and in person. In the event of an SBD, the firm will assess which means of communication are still available to use and choose the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

Appendix F – Website Disclosure

Business Continuity Plan (BCP)

IWN's **emergency contact** persons are Jeff Zupancic, CEO (602) 494-0020 or jeff@indwealth.net and Art Dinkin, President (515) 461-5123 or adinkin@indwealth.net. This plan is subject to modification and updated versions will be posted to the firm website, www.indwealth.net and customers may also request a written copy of the plan by mail.

Our policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making an operational assessment, quickly recovering and resuming operations, protecting all the firm's books and records, and allowing our customers to transact business. If we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities through the Custodians. Our policy is distributed to all employees, posted on the firm's website, delivered to customers at account opening, and mailed to customers upon request.

Our plan anticipates two kinds of SBD's, internal and external. Internal SBD's affect our Urbandale, IA office's ability to communicate and do business, such as a fire in the building. External SBD's prevent the operation of the securities markets or several firms, such as a terrorist attack, a weather event, or other wide-scale disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of external service providers and our Custodians. IWN's intent is to stay in business during either an internal or an external SBD which may be expected to last longer than eight (8) hours by relocating key employees to an alternative work site to continue business functions as quickly as possible. If it is determined that the firm cannot recover and stay in business, customers may contact the primary Custodian, TD Ameritrade (800-669-3900) for access to their funds and securities. For customer assets held outside TD Ameritrade such as accounts with third party managers, mutual funds or insurance and annuity contacts, please refer to your individual statements for their direct contact information.

IWN and our custodian partners have back up facilities off-site which are tested and secure. In the event these locations are activated, the firm will communicate to our clients via a message on the effected office's phone system, email, post a notice on the firm website, and/or by whatever means available providing details of the situation and reminding customers of their access capabilities. IWN has made contingent back up plans for power phone, internet, and banking services to avoid any unnecessary delays in evoking this plan.

PLEASE DIRECT ANY QUESTIONS ABOUT THIS NOTICE TO YOUR ADVISER.